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**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of	)	
	)	
Price Cap Performance Review for	)	CC Docket No. 94-1
Local Exchange Carriers	)	
	)	
Federal State Joint Board on Universal	)	CC Docket No. 96-45
Service	)	
	)	
Low-Volume Long Distance Users	)	CC Docket No. 99-249
	)	
Access Charge Reform	)	CC Docket No. 96-262

**REPLY COMMENTS OF THE  
PERSONAL COMMUNICATIONS INDUSTRY ASSOCIATION**

On September 15, 1999, PCIA submitted a letter in this proceeding, urging that the Commission seek comment on all aspects of the CALLS access reform and universal service proposal.<sup>1</sup> On November 12, 1999, over 30 parties submitted their views on the proposal in response to the FCC's *Notice*.<sup>2</sup> PCIA is writing to very briefly respond to those initial comments.

In our September 15<sup>th</sup> letter, PCIA commended the CALLS Coalition's significant efforts in forging a consensus on complex access reform and universal service issues. Many other commenting parties express similar sentiments. PCIA also applauded the direction of the CALLS access reform plan. The overall effect of that plan is to recover fixed costs on a flat rated basis -- a structure much more consistent with the emerging

<sup>1</sup> PCIA Letter to Magalie Roman Salas, Secretary, CC Docket Nos. 96-45, 96-262, 94-1, 99-249, Sept. 15, 1999.

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competitive marketplace than the access charge framework in place today. Many other commenters shared this view.

The CALLS proposal also contains a universal service component that would create an additional \$650 million in funding obligations for the wireless and other telecommunications carriers who contribute to the federal universal service funds. PCIA's members strongly support the national goal of universal service and believe that it can be achieved through a system that is competitively neutral, technologically neutral, and targeted to true high cost areas. Like most in the wireless industry, however, PCIA's members simply do not have the resources to be deeply involved in the creation of cost models and the other important, but very complex issues, involved in determining the cost and affordability parameters needed to size the federal high cost fund.

The FCC has a vital role to play in this regard. Both consumers and telecommunications carriers look to the Commission for assurance that the universal service funding mechanisms are sufficient, fair, non-discriminatory, and consistent with the universal service provisions of the 1996 Act. The Commission now has before it the range of views and information it needs to make the determination on whether the additional funding responsibilities for wireless and other carriers that are part of the CALLS plan are in the public interest. PCIA will continue to champion the right of

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<sup>2</sup> Access Charge Reform *et al.*, CC Docket Nos. 96-262, 94-1, 99-249, 96-45, FCC 99-235, Notice of Proposed Rulemaking ("*Notice*") (rel. Sept. 15, 1999).

wireless and other carriers who meet the FCC's requirements for ETC status to be able to receive universal service funding on fair and non-discriminatory terms.

Respectfully Submitted,

A handwritten signature in black ink, reading "Mary McDermott". The signature is fluid and cursive, with the first name "Mary" and last name "McDermott" clearly distinguishable.

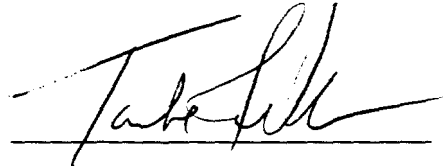
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December 3, 1999

## **CERTIFICATE OF SERVICE**

I, Taube Pecullan, do hereby certify that on the 3<sup>rd</sup> day of December 1999, a copy of the foregoing Reply Comments of the Personal Communications Industry Association was delivered to each of the following persons:

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A handwritten signature in black ink, appearing to read 'Taube Pecullan', written over a horizontal line.

Taube Pecullan

\* Denotes hand delivery

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